



Protecting Land & Water | Advocacy | Balanced Growth

VIA ELECTRONIC FILING

November 19, 2020

Ms. Jocelyn Boyd  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

RE: Piedmont Natural Gas Company, Inc.  
Notice of New Natural Gas Construction Project  
Docket No. 2012-278-G

Dear Ms. Boyd:

In reference to Piedmont Natural Gas Company, Inc.'s (PNG) notice to the Commission on July 7, 2020 about its Line 201 Extension project in Greenville County (**Attachment A**), Upstate Forever would like to add the contents of this letter and related attachments to the record. We also note that Order No. 2020-752 instructs your office to set a notice of a generic proceeding on PNG's 2020 construction notices. We know that comments are not customary within the context of this particular docket, but we see no other way to provide input regarding this expensive capital project prior to construction and prior to a rate case. **We would like to note concerns we have, both with this pipeline project as well as with the lack of any mechanism for determining the prudence and necessity of a project like this before it is built** (before environmental and property rights damage is done and before the company itself incurs significant costs that will be passed on to either ratepayers or shareholders).

Upstate Forever (UF) is a nonprofit conservation organization that protects critical lands, waters, and the unique character of Upstate South Carolina. We learned of the Line 201 Extension project on August 9 when Naturaland Trust shared a notice they received from PNG dated August 4 notifying them that their property would be surveyed for a new natural gas pipeline from Taylors to Travelers Rest. This particular property is a preserve for the highly endangered bunched arrowhead, a plant found only in this part of northern Greenville County and in one county in North Carolina. There are several preserves protecting this plant and its critical habitat in the area, including a SC DNR Heritage Preserve (that was also notified of pipeline-related surveying).

Upstate Forever immediately notified PNG of the sensitivity of the area along the proposed route, and a virtual meeting was facilitated on October 14 between Upstate Forever, Naturaland Trust, and members of the PNG project team based in Charlotte by Hank McCullough of PNG (who at that time served on the Upstate Forever Board of Directors). The PNG team did move the proposed route away from the preserves, but the current proposed route, as best as we can discern it, is still

environmentally problematic. The proposed 10 mile pipeline, with its 50 foot cleared right of way and various access roads, would run along the Enoree River starting near Taylors and then would turn northwest and run along Beaverdam Creek, a tributary of the Enoree River. PNG declined to provide UF with alignment maps but neighbors along Beaverdam Creek have contacted each other and shared information they received from PNG survey notices. The pipeline would require several water crossings, both of the Enoree River and Beaverdam Creek and of their many smaller tributaries that feed into them. **The potential for significant sediment runoff pollution from the construction activity is high given that the area has steep slopes and rain events are increasingly severe.** One known construction area, where the centerline has been visibly marked on East Darby Road, is perilously close to the Enoree River.

UF has experience documenting pipeline construction problems in the Upstate. Dominion's Moore to Chappells pipeline project in 2018 caused so much damage that an Upstate water utility had to temporarily shut down its intakes on the Tyger River. UF documented the damage and pursued a successful enforcement action at SC DHEC.<sup>1</sup> This type of damage is likely to occur with the PNG pipeline construction given the area's steep slopes and increasingly intense rainfall. It is also important to note that the pipeline would impact waters that are above the urbanized area of the Upstate. It is critical that we protect water quality before it flows through the urbanized area so that it can handle those urban impacts better. Indeed, the reason the bunched arrowhead thrives in this one area is because it is dependent upon pristine water and undisturbed wetlands.

In addition to the likelihood of negative water impacts, UF would like to note that small colonies of the endangered bunched arrowhead are still being found in the area, and it would be difficult for such a large construction project (10 miles long, 50-75 feet wide) to avoid destroying any of them.

**UF also has reason to question the necessity of the project, and therefore its prudence, in its entirety.** UF asked PNG to provide its business and growth assumptions that they are relying upon to justify the pipeline project, and PNG provided UF with **Attachment B**. The pipe diameter at 8 inches is quite large. It is capable of carrying tens of thousands of dekatherms of natural gas. UF asked PNG directly during our October 14 meeting why it was so large, and the response was that it needed to accommodate in-line inspection tools. But in a letter to the Commission (**Attachment C**) in this same docket, also filed on July 7, PNG notified the PSC that it was also planning to retrofit the *existing* Line 201 (a 17.75 mile pipeline that serves northern Greenville County) to allow it to accommodate an in-line inspection tool. It is our understanding that Line 201 is a 2 inch distribution line. Thus clearly an 8 inch diameter is not a requirement for in-line inspection required by PHMSA, as PNG implied in our meeting.

On **page 2 of Attachment B**, PNG asserts several things that are easily refutable.

*"There are many existing neighborhoods along the proposed pipeline route that would like to have natural gas service. Using a 1-mile radius along the Line 201 extension, there are approximately 3,200 parcels that would have the opportunity to be served a clean, affordable and reliable energy source safely."*

This is highly unlikely. This pipeline is high pressure (800 psi) steel transmission and cannot be tapped into for only a handful of residences. An entire existing neighborhood with a significant number of homes would need to agree unanimously to interconnect as a group - meaning they

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<sup>1</sup> <https://www.thestate.com/article236195328.html> (Mud pollution clogged a drinking water system. Now, Dominion Energy is in hot water, October 14, 2019, *The State*)

would all agree to change out their major appliances (furnaces, stoves, water heating) and commit to becoming PNG customers. This would involve considerable expense and is therefore improbable.

*“Surveys consistently show that when natural gas is available over 90% of homeowners will choose it as an energy source.”*

Natural gas for residential use is a choice. It is not a need. Electricity, water and sewer or septic are needs. Gas is not. In fact, in the coming years, it is likely that residential use of natural gas will fall out of favor for many reasons, including climate impacts<sup>2</sup> as well as indoor air quality impacts<sup>3</sup>. Gas stoves in particular can emit so much nitrogen dioxide that they cause the indoor air quality to exceed outdoor standards. The homes are, essentially, in non-attainment. As decarbonization increases and electric induction cooktops become less expensive, there will be little incentive for a home to be supplied by natural gas lines. Indeed, decarbonization by 2050 is Duke Energy’s goal<sup>4</sup>. Duke Energy is Piedmont Natural Gas’ parent company. These two are becoming increasingly strange bedfellows.

*“North Greenville University has expressed interest in adding natural gas to existing buildings when Piedmont is able to provide the needed capacity.”*

Greer CPW’s natural gas utility has distribution lines that extend to the intersection that is adjacent to NGU’s campus. UF spoke with Greer CPW and they confirmed that there are no jurisdictional or capacity barriers to serving NGU, based upon a 500 dekatherm per day estimate. Thus PNG service to that location is redundant and unnecessary.

*“Major Industrial customers at the northern extent of Piedmont’s system including Milliken, Sage Automotive, and Slater Mill will have improved natural gas security related to this project.”*

*“Furman University is a prestigious university that is served from the 200 psig HPD system.”*

Milliken and Sage are both sustainability-driven companies and it is unlikely they would want to increase their fossil fuel consumption. And if energy *security* for a handful of industrial customers is the sole remaining rationale for this project, then those customers alone should pay for the project. But it is doubtful that either these companies or the South Carolina Energy Users Committee would support this concept. UF contacted Furman University and confirmed that they have no interest in increased gas capacity. Their sustainability goals mandate that they reduce their carbon footprint rather than enlarge it. **If projects like this are justified only by the concept of energy security and reliability, then what is to stop PNG and other local distribution companies (LDCs) from building expensive redundancy all across the state? If redundancy is routinely found prudent, customer rates will skyrocket at a time when that is hardly helpful to economic recovery.**

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<sup>2</sup> <https://rmi.org/all-electric-new-homes-a-win-for-the-climate-and-the-economy/>

<sup>3</sup> <https://rmi.org/insight/gas-stoves-pollution-health/>

<sup>4</sup> <https://news.duke-energy.com/releases/duke-energy-aims-to-achieve-net-zero-carbon-emissions-by-2050>

In Attachment B, PNG also estimates serving **2,400 future residential customers**. Even if this growth comes to fruition, 2,400 residential customers represents only a tiny fraction of the pipeline's potential capacity. The average residential gas customer consumes .2 dekatherms per day. So 2,400 homes at future buildout would only account for 480 dekatherms of the pipeline's **tens of thousands** of dekatherms capacity. PNG has not shared the exact capacity of the proposed pipeline with UF, but for comparison purposes, Dominion's Moore to Chappells pipeline carries 80,000 dekatherms per day in a 12 inch pipe. While it is doubtful that the math is as simple as a ratio, one can still reasonably state that this 8 inch pipeline could carry tens of thousands of dekatherms per day, far more than is needed for PNG's own residential growth estimate. UF has scanned commercial and industrial gas contracts filed at the SC PSC for the past 3 years, and C&I usage ranges from 50 to 3,000 dekatherms per day for the most intense industrial purposes. Northern Greenville County simply isn't poised or prepared for industrial growth of the size that would justify this project. The Future Land Use Map for the County's Comprehensive Plan confirms this.<sup>5</sup>

**This brings us to our final and over-arching concern: property rights, eminent domain, and a lack of oversight.** State law gives PNG the right to use eminent domain to force landowners to sell a 50 foot easement to the company. But there is no mechanism to determine if this expensive capital project is 1) needed and 2) a wise use of ratepayer money prior to construction. PNG has the authority to build the pipeline, regardless of community needs and desires. They then take a chance that the PSC will find the project prudent, but that is **after the damage to water, land, endangered species, and property rights is done**. Natural gas pipelines that are regulated by the Federal Energy Regulatory Commission (FERC) must at least show need by having contracts in place before they are granted eminent domain authority via the Natural Gas Act. **There are no such protections for state-regulated projects such as this one.** As a result, UF anticipates this may be increasingly used as a tool to increase rate base by gas utilities whose rates are set by the SC PSC. A review of PNG's notices in Docket No. 2012-278-G over time indicates that large greenfield transmission projects of this type are unusual for PNG. This project, therefore, may signal a change from PNG's historic role as a local distribution company (LDC), and this deserves more scrutiny and oversight. **We ask that the PSC determine if it has or needs additional oversight authority in this situation, and that the Commission take action to improve oversight if possible.** We also ask that the Commission consider the following questions.

**Why is this project being proposed?** If it is for redundancy, it sets a dangerous and expensive precedent. If it is for growth, it is massively oversized and redundant of Greer CPW's capabilities and PNG's own existing Line 201. We have included **Attachment D**, a document prepared for Upstate Forever's Board of Directors, that illustrates the approximate proposed pipeline route in relation to Greer CPW's current service territory.

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<https://www.greenvillecounty.org/LongRangePlanning/pdf/PLAN%20GREENVILLE%20COUNTY%20FLU%20Map.pdf>

**Why is it so big?** PNG proves in **Attachment C** that in-line inspection ability can be achieved in a smaller pipeline, and demand certainly doesn't warrant 8 inches.

**Why is PNG proposing expensive, disruptive greenfield construction rather than focusing on improvements to the existing Line 201?**

In summary: This is an excessively large project that will benefit few, is not needed, and will have significant environmental and property rights impacts. The cost will be borne by ratepayers and by the landowners who must cede control of their property to PNG. Growth is not desired by most northern Greenville County residents, and an appropriate amount of natural gas capacity is already being supplied to the area both by PNG's existing 2" line and by Greer CPW.

Please do not hesitate to contact me if you have any questions.

Sincerely,



**Shelley Hudson Robbins**  
**Energy and State Policy Director**  
**Upstate Forever**  
[srobbins@upstateforever.org](mailto:srobbins@upstateforever.org)  
**864-921-0293**

Attachments:

Attachment A: July 7, 2020 Line 201 Extension Project Notice

Attachment B: PNG Project Summary

Attachment C: July 7, 2020 Line 201 Upgrade Notice

Attachment D: Upstate Forever Analysis of the Line 201 Extension Project (illustrated)

# Attachment A

July 7, 2020 Line 201 Extension Project Notice

McGuireWoods LLP  
201 North Tryon Street  
Suite 3000  
Charlotte, NC 28202-2146  
Phone: 704.343.2000  
Fax: 704.343.2300  
www.mcguirewoods.com

T. Richmond McPherson III  
Direct: 704.343.2038

McGUIREWOODS

rmcpherson@mcguirewoods.com

July 7, 2020

**VIA ELECTRONIC FILING**

Ms. Jocelyn Boyd  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

RE: Piedmont Natural Gas Company, Inc.  
Notice of New Natural Gas Construction Project  
Docket No. 2012-278-G

Dear Ms. Boyd:

Piedmont Natural Gas Company, Inc. ("Piedmont" or "Company") is required to notify the Public Service Commission of South Carolina ("Commission") "of any construction projects resulting in a cost of \$500,000 or more." See 26 S.C. Code Ann. Reg. 103-412.2.7. In compliance with Commission regulation, this letter serves as notification to the Commission that Piedmont plans to install approximately 10 miles of 8-inch steel transmission line as an extension of Line 201, including a new regulator station at its end. This project will extend from the existing Wood River Way regulatory station in Greenville to the new regulator station to be located near Hwy 25 north of Travelers Rest. Piedmont expects to complete construction on project F02242101 by October 31, 2022.

By copy of this letter, Piedmont is also notifying the ORS of this construction pursuant to S.C. Code Ann. Reg. 103-412.2.7(A).

Please do not hesitate to contact us with any questions.

Sincerely,

/s/ T. Richmond McPherson III  
T. Richmond McPherson III

TRM/sko

cc: ORS  
Bruce Barkley  
Pia Powers  
James Jeffries



# Attachment B

PNG Project Summary



## **Project Summary – System Infrastructure (SYSST) – Greenville, SC: Line 201 Extension -8” Steel X 10 Miles and new RS**

### Section 1 – General Information

Funding Project Type: System Infrastructure (SYSST)

Project Name: Greenville, SC Line 201 Extension - 8” Steel X10 Miles and New RS

Resource Center: Greenville

State: South Carolina

Target In- Service: 10-31-2022

In-Service Date Compliance Driven: No

Executor: Major Projects

#### Opportunity/Threat Statement:

System Modeling shows the need to extend Line 201 to increase the pressure of the 200 psig HDP (high pressure distribution) system; this is due to growth in the City of Greenville and the northern portion of Greenville County. The 200 psig HPD system primarily feeds the City of Greenville and northern Greenville County. In the last two years the flow rate across the regulator station serving the 200 psig HPD system has increased 21%. Extending Line 201 to Travelers Rest will allow PNG to continue supporting current customers during the coldest winters, while also adding new capacity to the 200 psig HDP system in order to meet the future residential /commercial growth. In addition to supporting residential and commercial growth in northern Greenville County this project improves reliability by providing an additional feed to the 200 psig HPD benefiting the County as a whole and key industrial customers at the end of Piedmont’s system north of Travelers Rest.

#### Objective:

Extend Line 201 with approximately 10 miles of 8” steel (design pressure 1,000 psig) near the existing Wood River Way RS (regulator station) 3713 to US-25 and E Bowers Road to feed the 200 psig HDP system. Install a launcher and receiver at the beginning and ending of the extended transmission line. Install a new regulator station near US-25 and E Bowers Road that meets the capacity requirements and is in accordance with PNG design standards.

### Section 2 – Technical Specifications

Type: Transmission

Design Pressure: 1000 psig

MAOP: 800 psig

Max Working Pressure: 800 psig

Min Working Pressure: 250 psig

Required Delivery Pressure: 200 psig:

Classification: designed for Class 3 location, per 49 CFR Part 192.5

### Section 3– Customer Growth Projection

- Greenville County is one of the fastest growing counties in the South Carolina with a population of 500,000.
- Piedmont Natural Gas serves 90,917 customers in Greenville County and customer growth is 2%-3% annually. Conservatively, Piedmont Natural Gas will add 44,000 new customers in the next 20 years and the Line 201 Extension Project is critical in meeting growing demand while maintaining gas distribution system functionality and reliability.
- There are many existing neighborhoods along the proposed pipeline route that would like to have natural gas service. Using a 1-mile radius along the Line 201 extension, there are approximately 3,200 parcels that would have the opportunity to be served a clean, affordable and reliable energy source safely.
- Surveys consistently show that when natural gas is available over 90% of homeowners will choose it as an energy source.
- North Greenville University has expressed interest in adding natural gas to existing buildings when Piedmont is able to provide the needed capacity.
- Piedmont is currently working with the Cherokee Valley Community north of Tigerville to provide natural gas service that will be supported by this project.
- Major Industrial customers at the northern extent of Piedmont's system including Milliken, Sage Automotive, and Slater Mill will have improved natural gas security related to this project.
- Furman University is a prestigious university that is served from the 200 psig HPD system.

Using the new regulator station design capacity:

Estimated Present Customer Count: 1,500 customers

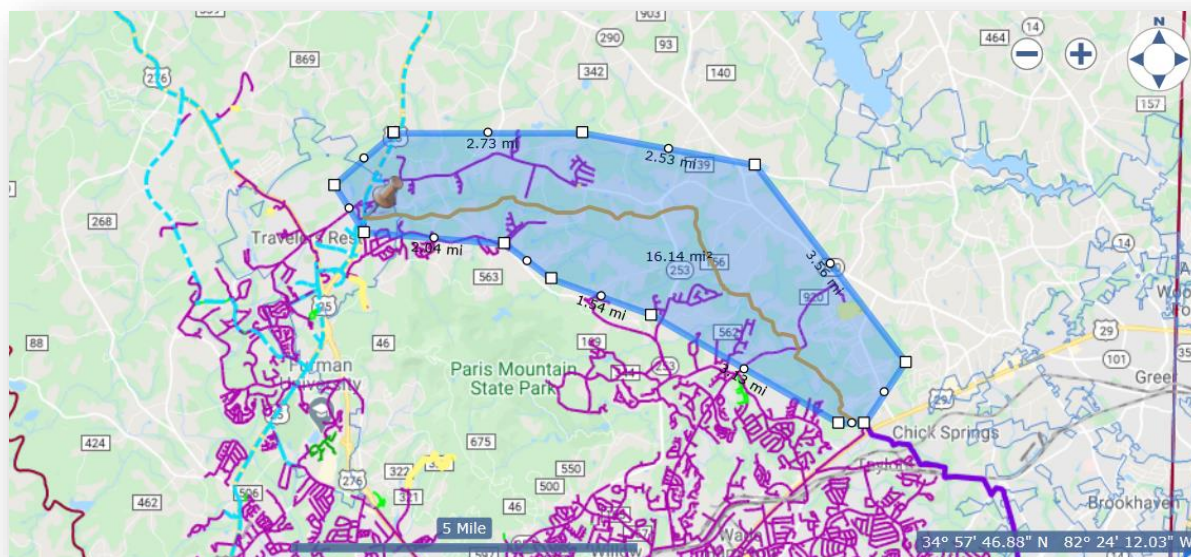
Estimated Future Customer Count: 2,400 customers

Note: The present and future load will serve a mixture of residential and commercial customers.

Using the additional capacity along the new pipeline approximately 2,100 customers could be served; there are approximately 3,200 parcels as noted above.

The total estimate of new customers directly supported by the Line 201 Extension is 4,500.

Picture below represents the 1-mile radius along the proposed pipeline route:



# Attachment C

July 7, 2020 Line 201 Upgrade Notice

July 7, 2020

**VIA ELECTRONIC FILING**

Ms. Jocelyn Boyd  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
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Dear Ms. Boyd:

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By copy of this letter, Piedmont is also notifying the ORS of this construction pursuant to S.C. Code Ann. Reg. 103-412.2.7(A).

Please do not hesitate to contact us with any questions.

Sincerely,

/s/ T. Richmond McPherson III  
T. Richmond McPherson III

TRM/sko

Page 2

cc: ORS  
Bruce Barkley  
Pia Powers  
James Jeffries

# Attachment D

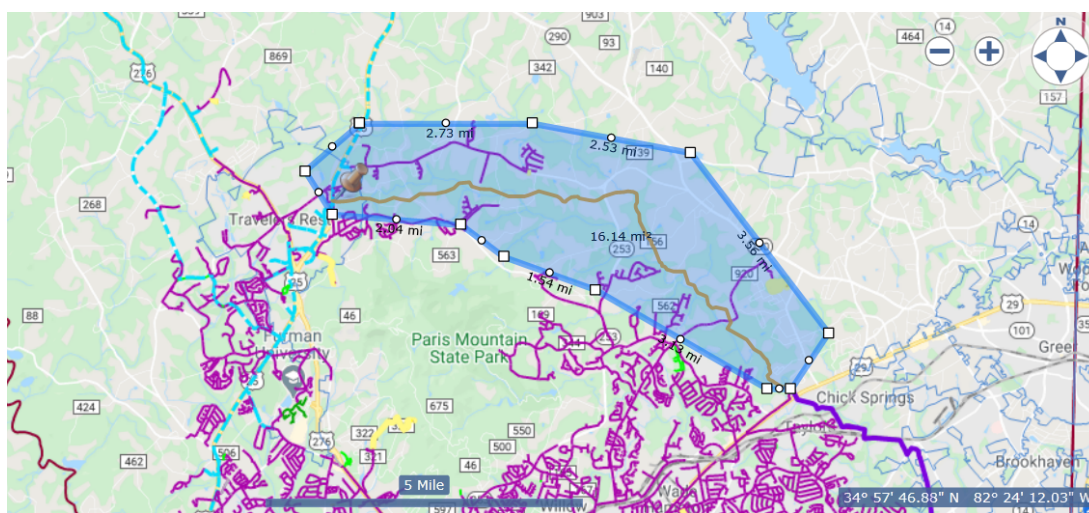
Upstate Forever Analysis of the Line 201 Extension Project (illustrated)



## Proposed Piedmont Natural Gas Line 201 Extension Project

Piedmont Natural Gas (PNG) is proposing to build a 10 mile 8" steel natural gas transmission pipeline from Taylors to near Travelers Rest. The pipeline would have a **50 foot wide permanent right-of-way (ROW)** and would require up to 75 feet of right-of-way during construction. The ROW would be acquired from property owners through easements, and PNG has eminent domain authority if landowners refuse to cooperate. The proposed route runs northwest along the Enoree River and then turns west and runs along Beaverdam Creek, terminating beside Gateway Elementary School on Highway 25.

The original route near Beaverdam Creek significantly impacted several parcels with endangered bunched arrowhead, and after meeting with Upstate Forever and Frank Holleman, PNG made a concerted effort to alter the route to avoid bunched arrowhead. The current route (yellow line) and a surrounding one mile radius are shown below.



PNG currently has a 2" **existing** pipeline that serves northern Greenville County that starts near the Donaldson Center and approaches the proposed pipeline along Highway 25. Greer CPW also has gas service lines in the area (discussed later).

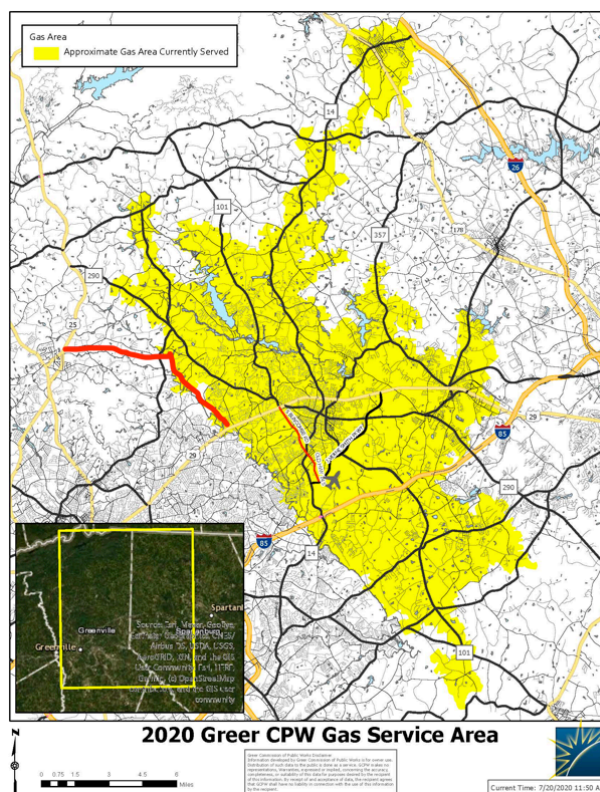
### PNG's Customer Growth Projections:

PNG shared their growth assumptions about the pipeline when UF requested them. PNG assumes the pipeline will eventually serve 2,400 **new** residences in northern Greenville County. They also reference the possibility of serving existing neighborhoods along the route and they note that they currently serve Furman University, Milliken, Sage Automotive and Slater Mill in northern Greenville County. They do not project additional industrial growth in the area but reference improved reliability instead. (But access to dual pipelines constitutes very expensive and unnecessary redundancy.)

The residents of northern Greenville County have been very vocal in their opposition to the growth of subdivisions and uncontrolled sprawl. Councilman Joe Dill has proposed a development amendment that would limit the proliferation of subdivisions in this area, making 2,400 new residences unlikely if it passes. Further, PNG's projected growth is largely inconsistent with the Comprehensive Plan. Given these factors, the projected build-out is unlikely. Upstate Forever shared this information with PNG early in the conversation. We must also point out that natural gas is not a requirement for housing. It is a *want* and not a *need*. Senator Tom Corbin and Greenville County Councilman Joe Dill, both of whom represent the area, have expressed concerns that this pipeline could facilitate additional development in northern Greenville County. Representative Mike Burns has expressed concerns over the use of eminent domain for the project.

**PNG's assertion that neighborhoods along the route could be served by the pipeline is also highly unlikely.** This pipeline is high pressure (800 psi) steel transmission and cannot be tapped into for only a handful of residences. An entire neighborhood with a significant number of homes would need to agree unanimously to interconnect as a group - meaning they would all agree to change out their major appliances (furnaces, stoves, water heating). This would involve considerable expense and is highly unlikely.

While PNG has some commercial and industrial customers in northern Greenville County (Furman University, Milliken, Sage Automotive, Slater Mill), it is unlikely that these customers will significantly *increase* their demand for natural gas in this era of corporate sustainability and climate change awareness. Furman University has confirmed this position to Upstate Forever. A *potential* customer exists in North Greenville University, but Greer CPW's natural gas utility already has distribution lines that reach an intersection right next to the university and we have confirmed with them that they have the available capacity to serve an estimated 500 dekatherms per day that a school of that size might need. Indeed, Greer CPW's gas territory (yellow on the map) already extends to much of the eastern side of PNG's proposed pipeline (shown on the Greer CPW map in **red**).



## Pipeline Size and Capacity Issues:

The proposed pipeline is 8" in diameter, operating at 800 psi, and is classified as transmission rather than distribution due to both of these factors. It would also be built to HCA Class III standards. HCA stands for High Consequence Area and is a reference to the risk inherent in the pipeline's location relative to population density and proximity to things like schools, churches and daycares. The **terminus** of the project at Highway 25 is in fact **adjacent to an elementary school**. HCA Class III is the second highest risk classification.

Energy supplied by natural gas pipelines is measured in dekatherms. For context, the recent Dominion Transco to Charleston project connecting from Spartanburg to Greenwood County transports 80,000 dekatherms per day through a 12" steel pipeline, and that capacity can be expanded by boosting the pressure. The proposed Line 201 Extension pipeline, at 8" steel, **can clearly transport in the tens of thousands of dekatherms** per day. But the only new demand indicated by PNG is the 2,400 new residences projected to be built in the coming years. This equates only to about **480 dekatherms** per day, or the **equivalent of about one average commercial customer** (Upstate Forever has analyzed gas contracts filed at the SC Public Service Commission). Thus the project is excessive for the stated demand.

## Environmental Concerns:

Upstate Forever requested detailed route alignment maps from PNG but our request was denied. A general map provided by PNG (shown on p. 1) indicates that the pipeline route runs along the Enoree River before turning west to run along Beaverdam Creek. It is unclear how close the right-of-way is to the river, but there are clearly several crossings. Pipeline construction results in significant land disturbance, and this is especially harmful when waters are crossed by or are adjacent to pipeline construction, especially now that rainfall is unpredictable and frequently intense in the Upstate, an area known for steep slopes and flashy creeks and rivers that overflow their banks easily. Maintaining healthy and undisturbed riparian buffers is a water protection priority for Upstate Forever.

And unless horizontal directional drilling (HDD) is required by SC DHEC for every water crossing, the **disturbance in the stream during construction is significant**. UF documented these types of disturbances in 2018 during the construction of the Dominion Transco to Charleston pipeline in Spartanburg and Laurens Counties, resulting in an enforcement action and fine by DHEC after sediment shut down a water utility's intake. ***Our waters near the top of the watershed are a priority.*** It is increasingly important that they be protected from degradation. The cleaner these waters start, the better they can handle downstream urban impacts.

In addition, the 10 mile 50 foot wide cleared right-of-way - *the equivalent of a 10 mile 5 lane highway* - represents a significant reduction in tree canopy and habitat along these waterways. **It is also the equivalent of 61 acres**, elongated into a corridor, **essentially clear cut**.

#### Cost Recovery:

This pipeline is a capital project for PNG and the company would seek cost recovery during its next rate case before the SC Public Service Commission. If the Commission ruled that this project is prudent, then it would become a part of the rate base that is **paid by all of PNG's customers, whether they benefit from the project or not**. Given the information presented earlier (that the only likely beneficiaries of the project would be 480 dekatherms of future new residential) and the likely cost of the project after challenges to eminent domain and water permitting, making the case for *imprudence* at the PSC would not be difficult. **Building a transmission pipeline capable of carrying tens of thousands of dekatherms for an estimated need of less than 500 dekatherms is not prudent use of ratepayer money.**

#### Recap:

This is an excessively large project that will benefit few, is *not needed*, and will have significant environmental and property rights impacts. The cost will be borne by ratepayers and by the landowners who must cede control of their property to PNG. Growth is not desired by most northern Greenville County residents, and an appropriate amount of natural gas capacity is already being supplied to the area both by PNG's existing 2" line and by Greer CPW.

#### Conclusion:

Based on all of these facts, Upstate Forever concludes that the PNG Line 201 Extension is unnecessary and not worth the risk and cost to the environment (the Enoree River and Beaverdam Creek), to the community, and to PNG's ratepayers. As such, **we oppose the project**.

Shelley Hudson Robbins  
Energy and State Policy Director  
October 16, 2020